

EXHIBIT 11

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#Retired

March 29, 2019

Our File: 84237.1

VIA U.S.1 Express

Clerk, Multi County - Asbestos
Middlesex County Superior Court
56 Paterson St., Tower Wing, 2nd Fl.
New Brunswick, New Jersey 08903

Re: April Dejesus and Edwin DeJesus v. Brentag North America, Inc., et al.
Docket No. MID-L-6247-18AS

Dear Sir/Madam:

Enclosed for filing in this matter, please find an original and two copies of the following:

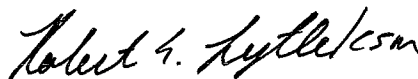
1. Plaintiffs' Notice of Motion to Sever All Claims In This Matter Against Defendant Imerys Talc America, Inc., Pursuant to R. 4:38-2a;
2. Brief in Support of Plaintiff's Motion to Sever Defendant Imerys Talc America, Inc., from this case;
3. Certification of Robert E. Lytle, Esq. in Support of Plaintiff's Motion to Sever, with Exhibits;
4. Proposed Form of Order; and
5. Certificate of Service.

I would appreciate it if you could file the originals, charge our depository account number 101500 for the filing fee, and return file-stamped copies in the enclosed self-addressed, stamped envelope. If you have any questions, please do not hesitate to contact me.

Thank you.

Very truly yours,

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.

A handwritten signature in cursive script, appearing to read "Robert E. Lytle/csm".

Robert E. Lytle, Esq.

REL/gah

Encl.

c: John C. McMeekin, II, Esq. (Via Federal Express)
All Counsel on the Attached List
Leah Kagan, Esq.

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SIMON GREENSTONE PANATIER, PC
1201 Elm Street, Suite 3400
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By: Robert E. Lytle (ID #046331990)

Attorneys for Plaintiffs

April Dejesus and Edwin DeJesus,

Plaintiffs,

v.

Brentag North America, Inc. , et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L-6247-18AS

Civil Action – Asbestos Litigation

NOTICE OF MOTION TO SEVER

To: All Counsel of Record

PLEASE TAKE NOTICE that on April 26, 2019, or as soon thereafter as counsel may be heard, the undersigned attorney for Plaintiffs, April Dejesus and Edwin DeJesus, shall move before the Middlesex County Superior Court, 56 Paterson Street, New Brunswick, New Jersey, for an Order in this matter severing all claims against Defendant Imerys Talc America, Inc.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon the accompanying Certification and letter brief in support of this motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs waive oral argument of this motion unless there is opposition.

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
Attorneys for Plaintiffs

By: Robert E. Lytle/csm
Robert E. Lytle, Esq.

Dated: March 29, 2019

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March 29, 2019

Via Lawyers Service

Honorable Ana C. Viscomi, J.S.C.
Superior Court of New Jersey
Middlesex County Courthouse
56 Paterson Street, Chambers 203
New Brunswick, New Jersey 08903

Re: April DeJesus and Edwin DeJesus v. Brentag North America, Inc. , et al.
Docket No. MID-L-6247-18AS

Plaintiff's Brief in Support of Motion to Sever All Claims Against Defendant
Imerys Talc America, Inc. ("ITA") From This Matter (By: Robert E. Lytle, Esq.)

Motion Returnable: April 26, 2019

Dear Judge Viscomi:

This firm, along with the firm of Simon Greenstone Panatier, P.C, represents Plaintiff in the above-referenced matter. Please accept this letter-brief, along with the accompanying Certification of Robert Lytle, Esq. ("Lytle Cert."), in support of Plaintiff's Motion to Sever all claims in this matter against Imerys Talc America, Inc. ("Imerys").

PRELIMINARY STATEMENT

Plaintiffs' counsel has named Imerys as a defendant in this case, as well as 55 other cases

filed with this Court. They all involve Plaintiffs who have been diagnosed with mesothelioma, some of who are still living and others who have died as a result of the disease. Plaintiffs allege that Imerys was a supplier of asbestos containing talc to various other Defendants, including Johnson & Johnson, for use in their talcum powder products sold and distributed to consumers, including the Plaintiff.

On February 13, 2019, Imerys filed for bankruptcy protection in the United States Bankruptcy Court for the District of Delaware. (Lytle Cert., ¶ 3 and Exhibit A). The Bankruptcy Court entered an Order the following day enforcing the stay provisions of the United States Code, 11 U.S.C. §§ 362, 365, 525 and 541(c). (Id., ¶ 4, Exhibit B). Imerys subsequently provided Notice of Chapter 11 Bankruptcy proceeding in this and each of the pending cases at issue on this motion. (Id., ¶ 6, Exhibit C). The Notice explained that:

[t]he filing of the case imposed an automatic stay . . . This means that creditors generally may not take action to collect debts from the debtors . . . creditors cannot sue, assert an action to collect debts . . . or otherwise try to collect from the debtor.

Id.

Because the automatic stay will result in an indefinite delay of this action against Imerys, Plaintiffs now move to sever all claims against the bankrupt defendant.

LEGAL ARGUMENT**ALL CLAIMS AGAINST IMERYYS SHOULD BE SEVERED IN ORDER
TO AVOID PREJUDICE AND FOR THE CONVENIENCE OF THE
PARTIES**

R. 4:38-2(a) provides that a court may order a separate trial of any claim for the convenience of the parties or to avoid prejudice. Innes v. Marzano-Lesnevich, 435 N.J. Super. 198, 245 (App. Div. 2014). The decision to grant or deny severance rests in the sound discretion of the trial court which will be not be disturbed on appeal absent an abuse of that discretion. Tobia v. Cooper Medical Center, 136 N.J. 335 (1994); Brown v. City of Bordentown, 348 N.J. Super. 143, 14 (App. Div. 2002). This Court should sever all claims against Imeryys - in order to avoid any prejudicial delay that may result to Plaintiff as a result of the automatic bankruptcy stay - so that the remaining claims against the non-bankrupt defendants can proceed to trial in the normal course.

“[T]he clear language of [11 U.S.C. §362(a)] stays actions only against a "debtor." McCartney v. Integra Nat'l Bank N., 106 F.3d 506, 509-10 (3d Cir. 1997). However, “the bankruptcy of a co-defendant [is] not [] cause for staying the proceedings as to other defendants.” Dall'Ava v. H.W. Porter Co., 199 N.J. Super. 127, 131 (App. Div. 1985); See also, Peju Province Winery v. Eibert, No. A-5008-05T5, 2007 N.J. Super. Unpub. LEXIS 2763, at *12-13 (App. Div. May 22, 2007)(The automatic stay “does not extend . . . to non-debtor co-defendants[.]”); Just New Homes, Inc. v. Sun Mgmt., No. A-2764-05T5, 2008 N.J. Super. Unpub. LEXIS 706, at *11-12 (App. Div. Feb. 5, 2008)(“The stay of litigation does not protect non-debtor parties who may

be subjected to litigation for transactions or events involving the debtor. Thus, for example, a suit against a co-defendant is not automatically stayed by the debtor's bankruptcy filing.").

In Gold v. Johns Manville Sales Corp., 723 F.2d 1068 (3d. Cir. 1983), the Third Circuit addressed the issues raised by Plaintiff on the instant motion. The appeal in Gold involved "a host of personal injury and wrongful death actions filed by plaintiffs who [had] been exposed to asbestos and to products manufactured from asbestos fiber." Id. at 1070. Among the defendants in those cases were Johns Manville Sales Corporation ("Manville") and U.N.R. Industries ("Unarco"), both of whom filed petitions for reorganization under Chapter 11 of the Bankruptcy Code during the litigations. Id. at 1071. Relying on the automatic stay provisions of the Bankruptcy Code, the non-bankrupt defendants moved for an order staying the litigations, and the plaintiffs cross-moved for an order severing all claims asserted against Johns Manville and Unarco. Ibid. The district courts denied the defendants' motions and granted the plaintiffs' cross-motions, "thus severing and staying all claims, counterclaims, cross-claims, and third-party claims brought by or against Johns-Manville and Unarco and requiring all remaining claims to proceed to trial." Ibid.

The Third Circuit subsequently affirmed, finding that the prejudice to the plaintiffs which would result from a delay in their actions outweighed any prejudice to the defendants:

In these cases, the clear damage to the Plaintiffs is the hardship of being forced to wait for an indefinite and, if recent experience is any guide, a lengthy time before their causes are heard. Moreover, we cannot ignore the fact that plaintiffs and crucial witnesses are dying, often from the very diseases that have led to these actions. We are not persuaded that the hardship imposed on defendants by proceeding to trial without Johns Manville or our legitimate interest in judicial

economy is sufficient to force these plaintiffs to forbear until the bankrupt defendants emerge from the reorganization proceedings. The defendants may be seriously inconvenienced by the resumption of the actions against them . . . the balance of hardship weighs in favor of the injured plaintiffs.

Id. at 1076.

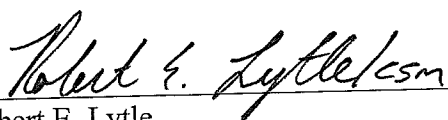
CONCLUSION

Consistent with Gold and the provisions of R. 4:38-2(a), this Court should enter an Order severing all claims asserted against Imerys, thereby staying them pending the outcome of the bankruptcy proceedings, in order to ensure that Plaintiffs' actions are not delayed as a result of the bankruptcy action filed by Defendant.

Respectfully submitted,

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.

By:


Robert E. Lytle

REL/jwk

Encl.

c: All Counsel of Record

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L-6247-18AS

Civil Action – Asbestos Litigation

**CERTIFICATION OF
ROBERT E. LYTLE**

ROBERT E. LYTLE, being of full age, certifies and says:

1. I am an attorney at law, admitted to practice in the State of New Jersey, and am co-counsel to Plaintiffs in this matter. As such, I am fully familiar with the facts of this case.
2. I submit this certification in support of Plaintiffs' Motion to sever all claims against Imerys Talc America, Inc. in this matter.
3. On February 13, 2019, Defendant Imerys Talc America, Inc. filed for Bankruptcy protection in the United States Bankruptcy Court for the District of Delaware, Case No. 19-10289-LSS (ECF 1). (Exhibit A).
4. On February 14, 2019, the United States Bankruptcy Court for the District of

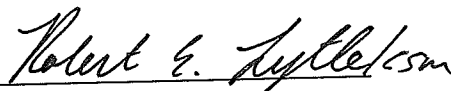
Delaware entered an Order Pursuant to 11 U.S.C. § 105 Enforcing the Protections of 11 U.S.C.

§§ 362, 365, 525, and 541(c) (ECF 60). This Order, among other things, “operates as a stay, applicable to all persons . . . to the . . . continuation . . . of a judicial, administrative or other proceeding against the debtors that arose before the commencement of the Chapter 11 cases . . .” (Exhibit B).

5. Thereafter, Plaintiff received a Notice of Chapter 11 Bankruptcy Case (ECF 84). (Exhibit C).

6. Inasmuch as the Order entered by the United States Bankruptcy Court for the District of Delaware has stayed any further proceeding in this matter against the Defendant, Imerys Talc America, Inc., the Defendant should be severed and action left to proceed when the stay is lifted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are wilfully false, I am subject to punishment.


Robert E. Lytle, Esq.

Dated: March 29, 2019

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A**

Exhibit A

Fill in this information to identify the case:

United States Bankruptcy Court for the:

District of Delaware
(State)

Case number (if known): Chapter 11

☐ Check if this is an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, Instructions for Bankruptcy Forms for Non-Individuals, is available.

1. Debtor's name	<u>Imerys Talc America, Inc.</u>	
2. All other names debtor used in the last 8 years	<u>Luzenac America, Inc.</u>	
	<u>Imerys Talc Ohio Inc.</u>	
	<u>Imerys Talc Delaware, Inc.</u>	
Include any assumed names, trade names, and doing business as names		
3. Debtor's federal Employer Identification Number (EIN)	<u>8 4 - 1 1 9 6 3 5 8</u>	
4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	<u>1732 North First Street</u>	<u>Number Street</u>
	<u>Suite 450</u>	<u>P.O. Box</u>
	<u>San Jose CA 95112</u>	<u>City State Zip Code</u>
	<u>Santa Clara</u>	<u>Location of principal assets, if different from principal place of business</u>
	<u>County</u>	<u>See attached Schedule 1</u>
		<u>Number Street</u>
		<u>City State Zip Code</u>
		<u>County</u>
5. Debtor's website (URL)	<u>https://www.imerys-performance-additives.com/</u>	
6. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____	

Debtor Imerys Talc America, Inc.
Name

Case number (if known) _____

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply:

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

2 1 2 3

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
- ☐ Chapter 9
- ☒ Chapter 11. Check all that apply:

☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).

☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

☐ A plan is being filed with this petition.

☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).

☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.

☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

If more than 2 cases, attach a separate list.

☒ No

☐ Yes. District _____ When _____ MM/DD/YYYY

Case number _____

District _____ When _____ MM/DD/YYYY

Case number _____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

List all cases. If more than 1, attach a separate list.

☐ No

☒ Yes. Debtor See attached Schedule 2

Relationship See attached Schedule 2

District See attached Schedule 2

Case number, if known _____

When Contemporaneously MM/DD/YYYY

Debtor Imerys Talc America, Inc.
Name

Case number (if known) _____

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? (Check all that apply.)

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety. What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____

Where is the property?

Number _____ Street _____

City _____

State _____

Zip Code _____

Is the property insured?

☐ No☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors (on a consolidated basis with Imerys Talc Vermont, Inc.)

- ☐ 1-49
- ☐ 50-99
- ☐ 100-199
- ☐ 200-999

- ☐ 1,000-5,000
- ☐ 5,001-10,000
- ☒ 10,001-25,000

- ☐ 25,001-50,000
- ☐ 50,001-100,000
- ☐ More than 100,000

15. Estimated assets (on a consolidated basis with Imerys Talc Vermont, Inc.)

- ☐ \$0-\$50,000
- ☐ \$50,001-\$100,000
- ☐ \$100,001-\$500,000
- ☐ \$500,001-\$1 million

- ☐ \$1,000,001-\$10 million
- ☐ \$10,000,001-\$50 million
- ☐ \$50,000,001-\$100 million
- ☒ \$100,000,001-\$500 million

- ☐ \$500,000,001-\$1 billion
- ☐ \$1,000,000,001-\$10 billion
- ☐ \$10,000,000,001-\$50 billion
- ☐ More than \$50 billion

Debtor Imerys Talc America, Inc.
Name

Case number (if known) _____

16. Estimated liabilities¹
(on a consolidated basis
with Imerys Talc Vermont,
Inc.)
☐ \$0-\$50,000
☐ \$50,001-\$100,000
☐ \$100,001-\$500,000
☐ \$500,001-\$1 million

☐ \$1,000,001-\$10 million
☐ \$10,000,001-\$50 million
☒ \$50,000,001-\$100 million
☐ \$100,000,001-\$500 million

☐ \$500,000,001-\$1 billion
☐ \$1,000,000,001-\$10 billion
☐ \$10,000,000,001-\$50 billion
☐ More than \$50 billion
Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both, 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature
of authorized
representative of debtor

- ☒ The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.
- ☒ I have been authorized to file this petition on behalf of the debtor.
- ☒ I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/13/2019
MM/DD/YYYY

X /s/ Alexandra Picard
Signature of authorized representative of debtor

Title Chief Financial Officer

Alexandra Picard
Printed name

18. Signature of attorney

X /s/ Mark D. Collins
Signature of attorney for debtor

Date 02/13/2019
MM/DD/YYYY

Mark D. Collins
Printed name

Richards, Layton & Finner, P.A.
Firm name

One Rodney Square, 920 North King Street
Number Street

Wilmington
City

302.651.7700
Contact Phone

2981
Bar number

DE 19801
State Zip Code

collins@rlf.com
Email address

DE
State

¹ The amount of estimated liabilities does not include contingent or potential future liabilities.

Schedule 1

Location of principal assets, if different from principal place of business

17509 Van Road, Houston, Texas 77049 (Harris County)

767 Old Yellowstone Trail, Three Forks, Montana 59752 (Gallatin County)

Schedule 2

Pending Bankruptcy Cases Filed by the Debtor and Affiliates of the Debtor

On the date hereof, each of the affiliated entities listed below (including the debtor in this chapter 11 case, collectively, the "Debtors") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware. The Debtors have filed a motion requesting that the chapter 11 cases of these entities be consolidated for procedural purposes only and jointly administered under the number assigned to the chapter 11 case of Imerys Talc America, Inc.

Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
Imerys Talc Canada Inc.

IMERYS TALC AMERICA, INC.

**Written Consent of the Board of Directors
in Lieu of a Meeting**

Date: February 13, 2019

The undersigned, constituting all of the members of the Board of Directors (the "Board") of Imerys Talc America, Inc., a Delaware corporation (the "Corporation"), acting in accordance with section 141(f) of the General Corporation Law of the State of Delaware, hereby waive notice of a meeting and hereby consent to and adopt the following resolutions as the action of the Board in lieu of a meeting and hereby direct that this written consent be delivered to the Corporation for inclusion in the minutes or filing with the corporate records.

Approval of Bankruptcy Filing

WHEREAS, the Board has reviewed and considered the materials presented by the management and financial and legal advisors of the Corporation regarding the potential present and future liabilities of the Corporation, the strategic alternatives available to it, and the impact of the foregoing on the Corporation's business;

WHEREAS, the Board has consulted with the management and financial and legal advisors of the Corporation and has considered fully each of the strategic alternatives available to the Corporation; and

WHEREAS, the Board has determined that it is in the Corporation's best interest to seek relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

NOW, THEREFORE, BE IT RESOLVED, that the Board hereby approves the commencement of a case under chapter 11 of the Bankruptcy Code by the Corporation (the "Chapter 11 Case").

RESOLVED FURTHER, that each officer of the Corporation (each, an "Authorized Person"), be, and each of them hereby is, acting singly, authorized to take all such steps and do all such acts and things as they shall deem necessary or advisable to commence the Chapter 11 Case, including, but not limited to, executing, verifying, and delivering a voluntary petition in the name of the Corporation under chapter 11 of the Bankruptcy Code and causing the same to be filed with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), the making of any and all other necessary filings with the Bankruptcy Court and any other filings that such Authorized Persons determine to be necessary or advisable, the making and execution of any necessary or advisable instruments, certificates, affidavits, or other documents in connection therewith, the signing or endorsement of any checks, posting of any bonds, and the payment of any fees and expenses in such connection, and to take any and all action to make, execute, verify, and file all applications, certificates, documents, or other instruments and to do any and all acts and things that any one or more of them shall deem

necessary, advisable, or appropriate in order to carry out the intent and purpose of any and all of the foregoing resolution.

RESOLVED FURTHER, that each Authorized Person be, and hereby is, authorized, directed, and empowered, with full power of delegation, on behalf of and in the name of the Corporation, to execute, verify, and/or file, or cause to be filed and/or executed or verified (or direct others to do so on their behalf as provided herein), and to amend, supplement, or otherwise modify from time to time, all necessary or appropriate documents, including, without limitation, petitions, affidavits, schedules, motions, lists, applications, pleadings, and other documents, agreements, and papers, including any and all loan agreements, documents, notes, guaranties, security agreements, pledge agreements, and all other documents, agreements, or instruments as may be deemed necessary or appropriate by such Authorized Person, and to take any and all actions that the Authorized Person deems necessary or appropriate, each in connection with the Chapter 11 Case, any postpetition financing, or any cash collateral usage contemplated hereby or thereby.

RESOLVED FURTHER, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain the law firms of Latham & Watkins LLP and Richards, Layton & Finger, P.A. to act as attorneys for the Corporation in connection with the Chapter 11 Case.

RESOLVED FURTHER, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain Alvarez & Marsal North America, LLC as financial advisor to the Corporation in connection with the Chapter 11 Case.

RESOLVED FURTHER, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain Prime Clerk LLC as claims, noticing, and solicitation agent and administrative advisor for the Corporation in its Chapter 11 Case.

RESOLVED FURTHER, that each Authorized Person be, and hereby is, authorized, directed, and empowered, on behalf of and in the name of the Corporation, to employ and retain such further legal, restructuring, financial, accounting, and other professionals (together with the foregoing identified firms, the "Professionals") as may be deemed necessary or appropriate by any Authorized Person to assist the Corporation in carrying out its responsibilities in the Chapter 11 Case and achieving a successful reorganization.

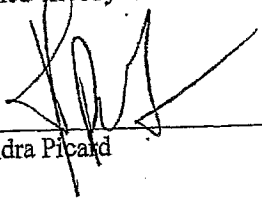
RESOLVED FURTHER, that, each Authorized Person be, and hereby is, authorized, with full power of delegation, in the name and on behalf of the Corporation, to take or cause to be taken any and all such further action and to execute and deliver or cause to be executed or delivered, and to amend, supplement, or otherwise modify from time to time, all such further agreements, documents, certificates, statements, notices, undertakings, and other writings, and to incur and to pay or direct payment of all such fees and expenses, as in the judgment of the Authorized Person shall be necessary, appropriate, or advisable to effectuate the purpose and intent of any and all of these resolutions.

RESOLVED FURTHER, that all acts lawfully done or actions lawfully taken by any officer of the Corporation or any of the Professionals in connection with the Chapter 11 Case or any proceedings related thereto, or any matter related thereto, be, and hereby are, adopted, ratified, confirmed, and approved in all respects as the acts and deeds of the Corporation.

RESOLVED FURTHER, that any and all actions, whether previously or subsequently taken by any Authorized Person or any other person authorized to act by an Authorized Person, that are consistent with the intent and purpose of the foregoing resolutions or in connection with any matters referred to herein, shall be, and the same hereby are, in all respects, ratified, approved, and confirmed.

[Signature Page(s) Follow]

IN WITNESS WHEREOF, the undersigned hereby consent to the actions set forth herein effective as of the date first set forth above.




Alexandra Picard

Kevin Collins

Giorgio La Motta

IN WITNESS WHEREOF, the undersigned hereby consent to the actions set forth herein effective as of the date first set forth above.

Alexandra Picard




Kevin Collins

Giorgio La Motta

IN WITNESS WHEREOF, the undersigned hereby consent to the actions set forth herein effective as of the date first set forth above.

Alexandra Picard

Kevin Collins



Giorgio La Motta

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----	X	
In re:	:	Chapter 11
	:	
IMERYYS TALC AMERICA, INC., <i>et al.</i> , ¹	:	Case No. 19-_____ (____)
	:	
Debtors.	:	(Joint Administration Requested)
	:	
-----	X	

**DEBTORS' CONSOLIDATED LIST OF THE TOP THIRTY LAW FIRMS WITH THE
MOST SIGNIFICANT REPRESENTATIONS OF TALC CLAIMANTS**

The following is a consolidated list (the "Top Plaintiffs' Firms List"), in alphabetical order, of the top thirty law firms with the most significant representations of parties asserting talc claims against Imerys Talc America, Inc. and Imerys Talc Vermont, Inc. (together with Imerys Talc Canada Inc., the "Debtors").² Concurrently with this petition, the Debtors have filed a motion seeking authority to file this Top Plaintiffs' Firms List (on a consolidated basis) and a consolidated list of creditors holding the thirty largest unsecured claims (excluding talc claims). The Top Plaintiffs' Firms List does not include any person or entity who is an "insider" under section 101(31) of title 11 of the United States Code. The Top Plaintiffs' Firms List was prepared with information existing as of January 31, 2019. The Debtors reserve the right to amend the Top Plaintiffs' Firms List based on additional information they may identify. The information contained in the Top Plaintiffs' Firms List shall not constitute an admission by, nor shall it be binding on, the Debtors.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050), and Imerys Talc Canada Inc. (6748). The Debtors' address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

² No talc-related personal injury claims have been filed against Imerys Talc Canada Inc.

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
Ashcraft & Gerel, LLP	Attn: James F. Green 4900 Seminary Road, Ste. 650 Alexandria, VA 22311 Phone: 703-997-1774 Email: JGreen@ashcraftlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Beasley Allen Crow Methvin Portis & Miles PC	Attn: Leigh O'Dell 218 Commerce Street P.O. Box 4160 Montgomery, AL 36103-4160 Phone: 800-898-2034 Fax: 334-954-7555 Email: leigh.odell@beasleyallen.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Belluck & Fox, LLP	Attn: Joseph Belluck 546 5th Avenue, 4th Floor New York, NY 10036 Phone: 212-681-1575 Email: jbelluck@belluckfox.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Burns Charest, LLP	Attn: Warren Burns 900 Jackson Street, Ste. 500 Dallas, TX 75202 Phone: 469-904-4550 Fax: 469-444-5002 Email: wburns@burnscharest.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Cohen Placitella & Roth, PC	Attn: Christopher Placitella 127 Maple Ave Red Bank, NJ 07701 Phone: 888-649-8431 Fax: 215-567-6019 Email: cplacitella@cpirlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Golomb & Honik, P.C.	Attn: Richard Golomb 1835 Market Street, Suite 2900 Philadelphia, PA 19102 Phone: 215-985-9177 Fax: 215-985-4169 Email: rgolomb@golombhonik.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Gori Julian & Associates P.C.	Attn: Randy Gori 156 N Main St. Edwardsville, IL 62025 Phone: (888) 362-6890 Fax: 614-659-9834 Email: randy@gorijulianlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
Kazan, McClain, Satterley & Greenwood	Attn: Joseph Satterley 55 Harrison St., Suite 400 Oakland, CA 94607 Phone: 877-995-6372 Fax: 510-834-4913 Email: jsatterley@kazanlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Kiesel Law LLP	Attn: Melanie Menses Palmer 8648 Wilshire Blvd Beverly Hills, CA 90211 Phone: 310-854-4444 Fax: 310-854-0812 Email: palmer@kiesel.law	Personal Injury	Disputed/ Contingent/ Unliquidated
Levy Konigsberg LLP	Attn: Robert Ellis 800 3 rd Ave, 11 th Floor New York NY 10022 Phone: 212-605-6200	Personal Injury	Disputed/ Contingent/ Unliquidated
Maune, Raichle, Hartley, French & Mudd, LLC	Attn: David Amell 70 Washington St., Suite 200 Oakland, CA 94607 Phone: 800-358-5922 Email: damell@mrhfinlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
McDermott & Hickey, LLC	Attn: Kevin McDermott 20525 Center Ridge Rd, Ste 200 Rocky River, OH 44116 Phone: 216-712-7452 Fax: 216-916-9238 Email: kevin@modernmthickeylaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Meirowitz & Wasserberg, LLP	Attn: Samuel Meirowitz 233 Broadway Suite 2070 New York, NY 10279 Phone: 212-897-1988 Fax: 646-432-6887 Email: sam@mwinjurylaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Morelli Law Firm, PLLC	Attn: Benedict Morelli 777 Third Avenue, 31st Floor New York, NY 10017 Phone: 212-751-9800 Fax: 212-751-0046 Email: bmorelli@morellilaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Morris Bart, LLC	Attn: Richard Root 601 Poydras Street, 24th Floor New Orleans, LA 70130 Phone: 504-217-2793 Fax: 504-599-3380 Email: rroot@morrisbart.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Motley Rice LLC	Attn: Carman Scott 28 Bridgeside Boulevard Mt. Pleasant, SC 29464 Phone: 843-216-9000 Email: cscott@motleyrice.com	Personal Injury	Disputed/ Contingent/ Unliquidated

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
Napoli Shkolnik PLLC	Attn: Hunter Shkolnik One Greentree Center, Ste. 201 10000 Lincoln Drive Marlton, NJ 08053 Phone: 212-397-1000 Email: hunter@napolilaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Porter & Malouf, PC	Attn: Timothy W. Porter 825 Ridgewood Road Ridgeland, MS 39157 Phone: 601-957-1173 Fax: 601-957-7366 Email: tim@portermalouf.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Potts Law Firm	Attn: Adam Funk 3737 Buffalo Speedway, Ste. 1900 Houston, TX 77098 Phone: 713-963-8881 Email: afunk@potts-law.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Onder, Shelton, O'Leary & Peterson, LLC	Attn: Stephanie Rados 110 E. Lockwood, 2nd Floor St. Louis, MO 63119 Phone: 314-963-9000 Email: rados@onderlaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Robinson Calcagnie, Inc.	Attn: Mark Robinson 19 Corporate Plaza Drive Newport Beach, CA 92660 Phone: 949-720-1288 Fax: 949-720-1292 Email: mrobinson@robinsonfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Sanders Phillips Grossman, LLP	Attn: Randi Kassan 2860 Michelle Drive, Ste. 220 Irvine, CA 92606 Phone: 888-570-4528 Fax: 516-741-0128 Email: rkassan@thesandersfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Simmons Hanly Conroy, LLC	Attn: Laurence Nassif 112 Madison Avenue, 7th Floor New York, NY 10016 Phone: 212-784-6400 Fax: 212-213-5949 Email: lnassif@simmonsfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Simon Greenstone Panatier, PC	Attn: Jeffrey Simon 1201 Elm Street, Suite 3400 Dallas, TX 75204 Phone: 214-276-7680 Fax: 214-276-7699 Email: jsimon@sgpblaw.com	Personal Injury	Disputed/ Contingent/ Unliquidated

Name of Law Firm	Name, Telephone Number, Mailing Address, and E-mail of Law Firm Contact	Nature of Claim	Indicate if Claim is Contingent, Unliquidated, Disputed or Subject to Set-off
The Dugan Law Firm, APLC	Attn: James R. Dugan 365 Canal Street, Ste. 1000 New Orleans, LA 70130 Phone: 504-648-0180 Fax: 504-648-0181 Email: jdugan@dugan-lawfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
The Lanier Law Firm, PLLC	Attn: Mark Lanier 6810 FM 1960 W Houston, TX 77069 Phone: 713-569-5200 Fax: 713-659-2204 Email: wml@lanierlawfirm.com, mark.lanier@lanierlawfirm.com	Personal Injury	Disputed/ Contingent/ Unliquidated
The Miller Firm, LLC	Attn: Michael Miller 108 Railroad Avenue Orange, VA 22960 Phone: 540-672-4224 Fax: 540-672-3055 Email: mmiller@millerfirmllc.com	Personal Injury	Disputed/ Contingent/ Unliquidated
The Smith Law Firm, PLLC	Attn: Robert Allen Smith, Jr. 681 Towne Center Boulevard, Ste B. Ridgeland MS, 39157 Phone: 601-952-1422 Fax: 601-952-1426 Email: allen@smith-law.org	Personal Injury	Disputed/ Contingent/ Unliquidated
Waters Krause & Paul	Attn: Kevin Loew 222 N Sepulveda Blvd Ste 1900 El Segundo, CA 90245 Phone: 310-414-8146 Fax: 310-414-8156 Email: kloew@waterskraus.com	Personal Injury	Disputed/ Contingent/ Unliquidated
Weitz & Luxenberg P.C.	Attn: Perry Weitz 220 Lake Drive East, Suite 210 Cherry Hill, NJ 08002 Phone: 856-755-1115 Fax: 856-755-1995 Email: pweitz@weitzlux.com	Personal Injury	Disputed/ Contingent/ Unliquidated

Fill in this information to identify the case and this filing:

Debtor Name Imervs Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): _____

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership, or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ Schedule A/B: Assets-Real and Personal Property (Official Form 206A/B)
- ☐ Schedule D: Creditors Who Have Claims Secured by Property (Official Form 206D)
- ☐ Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 206E/F)
- ☐ Schedule G: Executory Contracts and Unexpired Leases (Official Form 206G)
- ☐ Schedule H: Codebtors (Official Form 206H)
- ☐ Summary of Assets and Liabilities for Non-Individuals (Official Form 206Sum)
- ☐ Amended Schedule _____
- ☐ Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders (Official Form 204)
- ☒ Other document that requires a declaration -- Consolidated List of the Top Thirty Law Firms with the Most Significant Representations of Talc Claimants

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/13/2019
MM/DD/YYYY

X

/s/ Alexandra Picard
Signature of individual on behalf of debtor

Alexandra Picard
Printed name

Chief Financial Officer
Position or relationship to debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

----- X
In re: : Chapter 11
Imerys Talc America, Inc. : Case No. 19-____ ()
Debtor. :
Employer Tax I.D. No. 84-1196358 :
----- X

**DEBTOR'S LIST OF EQUITY SECURITY HOLDERS
AND STATEMENT OF CORPORATE OWNERSHIP**

Pursuant to Rules 1007(a)(1), 1007(a)(3), and 7007.1 of the Federal Rules of Bankruptcy Procedure, the above-captioned debtor and debtor-in-possession submits the following list of equity security holders of the above-captioned debtor's stock:

Shareholder	Address of Shareholder	Number of Shares
Imerys Minerals Holding Limited	Par Moor Centre, Par Moor Road, PL24 2SQ Par, Cornwall United Kingdom	100

Fill in this information to identify the case and this filing:

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): _____

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership, or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets-Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule* _____
- ☐ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration -- *Debtor's List of Equity Security Holders and Statement of Corporate Ownership*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/13/2019
MM/DD/YYYY

X

/s/ Alexandra Picard
Signature of individual on behalf of debtor

Alexandra Picard
Printed name

Chief Financial Officer
Position or relationship to debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----	X	
In re:	:	Chapter 11
	:	
IMERYYS TALC AMERICA, INC., <i>et al.</i> , ¹	:	Case No. 19-_____ (____)
	:	
Debtors.	:	(Joint Administration Requested)
	:	
-----	X	

**CONSOLIDATED LIST OF CREDITORS HOLDING THE
THIRTY LARGEST UNSECURED CLAIMS**

Imerys Talc America, Inc., Imerys Talc Vermont, Inc., and Imerys Talc Canada Inc. (together, the "Debtors") each filed a petition in this Court on the date hereof for relief under chapter 11 of title 11 of the United States Code. Contemporaneously with the filing of their petitions, the Debtors filed a motion requesting, among other things, authority to file a consolidated list of creditors holding the thirty largest unsecured claims (the "Largest Unsecured Creditors List"), excluding parties asserting talc claims against the Debtors. Moreover, the Debtors have requested authority to file a separate consolidated list of the top thirty law firms with the most significant representations of parties asserting talc claims against the Debtors.

The Largest Unsecured Creditors List is based on the Debtors' books and records as of approximately February 12, 2019, and was prepared in accordance with Rule 1007(d) of the Federal Rules of Bankruptcy Procedure for filing in the Debtors' chapter 11 cases. The Largest Unsecured Creditors List does not include (i) persons who come within the definition of "insider" set forth in 11 U.S.C. § 101(31), or (ii) parties asserting talc claims against the Debtors or the law firms representing those parties.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050), and Imerys Talc Canada Inc. (6748). The Debtors' address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

The information contained in the Largest Unsecured Creditors List shall not constitute an admission by, nor shall it be binding on, the Debtors.

Fill in this information to identify the case and this filing:

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: Consolidated List of Creditors Who Have the 30 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 30 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 30 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	AOC, LLC 955 Highway 57 East Cottleville, TN 38017	Frederick S. Norman CEO & President EMAIL - FNorman@aoc-resins.com PHONE - (901) 854-2800 FAX - (901) 854-1183	Customer Payable	Unliquidated			\$750,000
2	William Day Construction Limited 2500 Elm Street Azilda, ON P0M 1B0 Canada	William Day President EMAIL - william.day@daygroup.ca PHONE - (705) 682-1555 FAX - (705) 682-2739	Trade Payable				\$623,617
3	UE Compression Holdings 9461 Willow Court Henderson, CO 80640	Jack Maley CEO EMAIL - jmaley@uecompression.com PHONE - 303-515-8600 FAX - 303-515-8554	Trade Payable	Unliquidated			\$135,000
4	Corning, Inc. One Riverfront Plaza Corning, NY 14831	Wendell P. Weeks Chairman and Chief Executive Officer EMAIL - Wendell.Weeks@corning.com PHONE - (607) 974-9000	Customer Payable				\$121,948
5	Tyoga Container Company 9 Fish Street Tioga, PA 16946	Charlie Frysinger President EMAIL - charlie@tyogacontainer.com PHONE - (570) 835-5296 ext. 227	Trade Payable	Unliquidated			\$87,000
6	BNSF Railway Company - Chicago 3110 Solutions Center Chicago, IL 60677-3001	Roger Nober General Counsel EMAIL - roger.nober@bnsf.com PHONE - (800) 795-2673	Trade Payable				\$83,448
7	Emera Energy Gas Trading 1223 Lower Water Street Halifax, NS B3J 3S8 Canada	Judy Steele President and COO EMAIL - judy.steele@emera.com PHONE - (902) 474-7800	Trade Payable				\$62,338

Case number (if known) _____

Debtor: Innervys Talc America, Inc.
Name

Name of creditor and complete mailing address, including zip code		Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, partially secured	Deduction for value of collateral or	Unsecured claim
8	Casella Organics 25 Greens Hill Ln Rutland, VT 05741	John W. Casella Chief Executive Officer EMAIL - john.casella@casella PHONE - (802) 775-0325 FAX - (802) 775-6198	Trade Payable				\$49,191
9	Laforest Electric 897 Government Road South Timmins, ON P4R 1N4 Canada	Richard Laforest Owner EMAIL - riaforest@vianet.ca PHONE - 705-264-3979 FAX - 705-566-8327	Trade Payable				\$36,688
10	Farber & Company 444 West Ocean Boulevard, Suite 516 Long Beach, CA 90802-4528	Eric Farber CEO & Chief Legal Officer EMAIL - eric@farberandco.com PHONE - (562) 432-8748 FAX - (562) 495-9170	Trade Payable				\$33,187
11	Material Motion, Inc. 203 Rio Circle Decatur, GA 30030	Steve Schneider President EMAIL - steve@materialmotion.com PHONE - 404-237-6127 FAX - 404-237-6128	Trade Payable				\$32,986
12	CN Canadian National Railway Company 935 de La Gauchetière Street West Montreal, QC H3B 2M9	Sean Finn Executive Vice-President Corporate Service and Chief Legal Officer EMAIL - sean.finn@cn.ca PHONE - (514) 399-8100	Trade Payable				\$32,789
13	Univar Canada, Ltd. 9800 Van Horne Way Richmond, BC V6X 1W5 Canada	Mike Hildebrand President EMAIL - mike.hildebrand@univarcanada.com PHONE - (604) 273-1441	Trade Payable				\$25,925
14	Savage Trucking, Inc. 29 Peck Road Chester, VT 05143	Kirk Aubry President and Chief Executive Officer EMAIL - kirkaubry@savageservices.com PHONE - 800-827-4439	Trade Payable				\$25,725
15	Amatic CPA Group 220 W Lamme St #3a Bozeman, MT 59715	Christina A. Reikenberg Shareholder EMAIL - orlekenberg@amaticscpa.com PHONE - 406-404-1925 FAX - 406-404-1926	Trade Payable				\$25,594
16	McLanahan Corporation 200 Wall Street Hollidaysburg, PA 16648	Sean K. McLanahan President and CEO EMAIL - smclanahan@mcclanahan.com PHONE - (814) 695 9807 FAX - (814) 695 6684	Trade Payable				\$21,935
17	Challenger Pallet & Supply, Inc. 1206 North Beck Street Salt Lake City, UT 84116	Tad Hegsted President EMAIL - hegsted.t@cpspallet.com PHONE - (801) 596-1969	Trade Payable				\$21,922
18	Nederman Mikropul Canada, Inc. 5865 McLaughlin Road, Unit 1 Mississauga, ON L5R 1B8 CANADA	Matthew Cusick Senior Vice President & CFO EMAIL - matthew.cusick@nederman.com PHONE - 48 42 18 87 00	Trade Payable				\$21,855
19	Nasco Propane 290 Railway St. Timmins, ON P4N 7E3 Canada	George Scott Owner EMAIL - PHONE - (705) 264-5213 FAX - (705) 264-6979	Trade Payable				\$21,302

Debtor: Imerys Talc America, Inc.
Name

Case number (if known) _____

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, partially secured	Deduction for value of collateral or	Unsecured claim
20	Steel Pro, Inc. 771 Main Street Rockland, ME 4841	Steve Ladd President EMAIL - steve.ladd@steelprousa.com PHONE - 207-596-0061 FAX - 207-596-0239	Trade Payable				\$20,250
21	Watkins & Shepard Trucking, Inc. P.O. Box 5328 Missoula, MT 59806-5328	Ray Kuntz CEO EMAIL - rayk@wksh.com PHONE - (406) 532-6121 FAX - (406) 721-4116	Trade Payable				\$20,175
22	Normand Verville Enterprises 449 Feldman Road Timmins, ON P4N 7E2 Canada	Normand Verville President EMAIL - vervilleent@hotmail.com PHONE - (705) 267-6707 FAX - (705) 268-1950	Trade Payable				\$19,290
23	C.H. Robinson Worldwide, Inc. 8100 Mitchell Road Suite 200 Green Prairie, MN 55344	Ben Campbell Chief Legal Officer EMAIL - ben.campbell@chrobinson.com PHONE - (952) 937-6713 FAX - (952) 937-6737	Trade Payable				\$17,630
24	Johnson Controls Fire Protection LP 5757 N. Green Bay Ave. P.O. Box 591 Milwaukee, WI 53201	George R. Oliver Chairman and Chief Executive Officer EMAIL - g.oliver@jcl.com PHONE - (414) 524-1200	Trade Payable				\$17,540
25	Cole International, Inc. 3033-34 Avenue, NE Calgary, Alberta T1Y 6X2 Canada	Donald Lucky President EMAIL - don.lucky@coleintl.com PHONE - (403) 262-2771 FAX - (403) 262-7301	Trade Payable				\$17,451
26	DMS Machining & Fabrication 10 Transport Dr. BARRE, VT 05641	Byron Atwood President & Owner EMAIL - byron@eamesoffice.com PHONE - 802-479-1088	Trade Payable				\$16,639
27	Northwestern Corporation 3010 W. 69th Street Souix Falls, SD 57108	Heather H. Grahame General Counsel EMAIL - heather.grahame@northwestern.com PHONE - 605-978-2900	Trade Payable				\$16,570
28	Union Gas, Ltd. 50 Keil Drive North Chatham, ON N7M 5M1 Canada	Stephen W. Baker President & Director EMAIL - sbaker@unlongas.com PHONE - 888-774-3111	Trade Payable				\$15,985
29	Geomapping Associates, Ltd. Inc. 1563 US Route 7 Pittsford, VT 57639-9554	James Purdy President EMAIL - geomappingltd@comcast.net PHONE - 802-483-6635 FAX - 802-483-6685	Trade Payable				\$15,215
30	Traffic Tech 180 N. Michigan Ave. Suite 700 Chicago, IL 60601	Mark Schiele President EMAIL - m.schiele@trafficttech.com PHONE - 877-383-1167	Trade Payable				\$14,740

Fill in this information to identify the case and this filing:

Debtor Name Imerys Talc America, Inc.

United States Bankruptcy Court for the District of Delaware

Case number (if known): _____

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership, or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets-Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule* _____
- ☒ *Chapter 11 or Chapter 9 Cases: Consolidated List of Creditors Who Have the 30 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/13/2019
MM/DD/YYYY

X

/s/ Alexandra Picard
Signature of individual on behalf of debtor

Alexandra Picard
Printed name

Chief Financial Officer
Position or relationship to debtor

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Exhibit B

391388.1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----	X	
In re:	:	Chapter 11
	:	
IMERYS TALC AMERICA, INC., <i>et al.</i> , ¹	:	Case No. 19-10289 (LSS)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	X	Re: Docket No. 16

**ORDER PURSUANT TO 11 U.S.C. § 105 ENFORCING
THE PROTECTIONS OF 11 U.S.C. §§ 362, 365, 525, AND 541(c)**

Upon the motion (the "Motion")² of the Debtors for entry of an order enforcing the protections of sections 362, 365, 525, and 541(c) of the Bankruptcy Code; and the Court having reviewed the Motion and the Picard Declaration; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050), and Imerys Talc Canada Inc. (6748). The Debtors' address is 100 Mansell Court East, Suite 300, Roswell, Georgia 30076.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this Order, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED, as set forth herein.
2. Pursuant to and to the extent set forth in section 362 of the Bankruptcy Code, the commencement of these Chapter 11 Cases shall operate as a stay, applicable to all persons (including individuals, partnerships, corporations, and all those acting for or on their behalf) and all foreign and domestic governmental units (and all those acting for or on their behalf) of:
 - a. The commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the Debtors that was or could have been commenced before the commencement of the Chapter 11 Cases, or an act to recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases;
 - b. The enforcement, against the Debtors or against property of their estates, of a judgment obtained before the commencement of the Chapter 11 Cases;
 - c. Any act to obtain possession of property of the estates or of property from the estates or to exercise control over property of the Debtors' estates;
 - d. Any act to create, perfect, or enforce any lien against property of the Debtors' estates;
 - e. Any act to create, perfect, or enforce against property of the Debtors any lien to the extent that such lien secures a claim that arose before the commencement of the Chapter 11 Cases;
 - f. Any act to collect, assess, or recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases;
 - g. The setoff of any debt owing to the Debtors that arose before the commencement of these Chapter 11 Cases, except as allowed under section 553 of the Bankruptcy Code; and

h. The commencement or continuation of a proceeding before the United States Tax Court concerning a tax liability of the Debtors for a taxable period the bankruptcy court may determine.

3. This Order shall not affect the exceptions to the automatic stay contained in section 362(b) of the Bankruptcy Code or the right of any party in interest to seek relief from the automatic stay in accordance with section 362(d) of the Bankruptcy Code.

4. Pursuant to and to the extent set forth in section 365(e) of the Bankruptcy Code, and notwithstanding a provision in an executory contract or unexpired lease, or in applicable law, an executory contract or unexpired lease of the Debtors may not be terminated or modified, and any right or obligation under such contract or lease may not be terminated or modified, at any time after the commencement of the Chapter 11 Cases solely because of a provision in such contract or lease that is conditioned on (i) the insolvency or financial condition of any or all Debtors or (ii) the commencement of the Chapter 11 Cases.

5. Pursuant to and to the extent set forth in section 525 of the Bankruptcy Code, a foreign or domestic governmental unit may not deny, revoke, suspend, or refuse to renew a license, permit, charter, franchise, or other similar grant to, condition such a grant to, discriminate with respect to such a grant against, deny employment to, terminate the employment of, or discriminate with respect to employment against, the Debtors or the Debtors' affiliates on account of (i) the commencement of the Chapter 11 Cases; (ii) the Debtors' insolvency; or (iii) the fact that the Debtors have not paid a debt that is dischargeable in Chapter 11 Cases.

6. Pursuant to and to the extent set forth in section 541(c) of the Bankruptcy Code, any interest of the Debtors in property becomes property of the estates, notwithstanding any provision in any agreement, transfer instrument, or applicable nonbankruptcy law, that: (a) restricts or conditions transfer of such interest by the Debtors, or (b) is conditioned on the insolvency or financial condition of the Debtors or on the commencement of the Debtors'

Chapter 11 Cases, and that effects or gives an option to effect a forfeiture, modification, or termination of the Debtor's interest in property.

7. This Order is intended to be declarative of and coterminous with, and shall neither abridge, enlarge nor modify, the rights and obligations of any party under sections 362, 365, 525, 541(c), and 553 of the Bankruptcy Code or any other provision of the Bankruptcy Code.

8. Nothing in the Motion or this Order, or any action taken by the Debtors in implementing this Order, shall be deemed or construed as (a) an admission as to the validity or priority of any claim against the Debtors or any lien on the Debtors' properties, or (b) an approval or assumption of any agreement, contract or lease pursuant to section 365 of the Bankruptcy Code, or (c) a waiver of the right of the Debtors, or shall impair the ability of the Debtors, to contest the validity and amount of any claim.

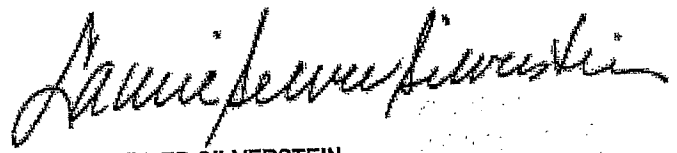
9. Notwithstanding the relief granted herein or any actions taken hereunder, nothing contained in this Order shall create any rights in favor of, or enhance the status of any claim held by, any person to whom any claim may be owed.

10. Neither the provisions contained herein, nor any actions made by the Debtors pursuant to this Order, shall be deemed an admission as to the validity of any underlying obligation or a waiver of any rights the Debtors may have to dispute such obligation on any ground that applicable law permits.

11. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: February 14th, 2019
Wilmington, Delaware



LAURIE SELBER SILVERSTEIN
UNITED STATES BANKRUPTCY JUDGE

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Exhibit C

Information to identify the case:**Debtor: IMERYS TALC AMERICA, INC.****EIN: 84-1196358****United States Bankruptcy Court District of Delaware****Case Number: 19-10289 (LSS)****Date cases filed for chapter 11: February 13, 2019****Official Form 309F (For Corporations or Partnerships)****Notice of Chapter 11 Bankruptcy Case**

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered. This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read all pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.gov).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

Valid Picture ID is required for access to the J. Caleb Boggs Federal Building.

1. Debtor's full name
Imerys Talc America, Inc.
2. All other names used in the last 8 years:
Luzenac America, Inc.
Imerys Talc Ohio Inc.
Imerys Talc Delaware, Inc.

Jointly Administered Cases [Other names, if any, used by the Debtor in the last 8 years appear in brackets and italics]	Case No.	Tax ID.	Address
Imerys Talc Vermont, Inc. [Windsor Minerals, Inc. Imerys Talc California, Inc.]	19-10291 (LSS)	03-0119050	1732 North First Street, Suite 450 San Jose, CA 95112
Imerys Talc Canada Inc. [Luzenac, Inc.]	19-10292 (LSS)	98-1306748	100 Water Tower Road Timmins, Ontario P4N 7J5 Canada

3. Address
1732 North First Street, Suite 450
San Jose, CA 95112

Exception to discharge
The bankruptcy clerk's office must receive the complaint within 14 days of the filing of the petition.

4. Debtors' attorney and claims agent (name and address)

RICHARDS, LAYTON & FINGER, P.A.
Mark D. Collins (No. 2981)
Michael J. Merchant (No. 3854)
Amanda R. Steele (No. 5530)
Brett M. Haywood (No. 5166)
One Rodney Square
920 N. King Street
Wilmington, Delaware 19801

Contact phone: (302) 651-7700
Email: collins@rlf.com
merchant@rlf.com
steele@rlf.com
haywood@rlf.com

LATHAM & WATKINS LLP
Jeffrey E. Bjork (admitted *pro hac vice*)
Helena G. Tseregounis (admitted *pro hac vice*)
355 South Grand Avenue, Suite 100
Los Angeles, California 90071-1560

Contact phone: (213) 485-1234
Email: jeff.bjork@lw.com
helena.tseregounis@lw.com

Richard A. Levy (admitted *pro hac vice*)
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611

Contact phone: (312) 876-7700
Email: richard.levy@lw.com

George A. Davis (admitted *pro hac vice*)
Keith A. Simon (admitted *pro hac vice*)
885 Third Avenue
New York, New York 10022

Contact phone: (212) 906-1200
Email: george.davis@lw.com
keith.simon@lw.com

Debtors' Notice and Claims Agent
If you have questions about this notice,
please contact Prime Clerk, LLC

Contact phone: (844) 339-4096
Email: imerysinfo@primeclerk.com

5. Bankruptcy clerk's office

Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at www.pacer.gov

824 Market Street, 3rd Floor
Wilmington, DE 19801

Hours open: Monday - Friday
8:00 AM - 4:00 PM
Contact phone (302) 252-2900

6. Meeting of creditors

The debtors' representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.

March 19, 2019 at 2:00 PM
The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

Location:
J. Caleb Boggs Federal Building
844 King Street, Room 3209
Wilmington, DE 19801

7. Proof of claim deadline

Deadline for filing proof of claim: Not yet set. If a deadline is set, notice will be sent at a later time.

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be filed either electronically or as a paper document. For more information on how to file a Proof of Claim, visit the Delaware Bankruptcy Court's website at <http://www.deb.uscourts.gov/claims-information>.

Your claim will be allowed in the amount scheduled unless:

- Your claim is designated as disputed, contingent or unliquidated;
- You file a proof of claim in a different amount; or
- You receive another notice

If your claim is not scheduled or if your claim is designated as disputed, contingent, or unliquidated, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at www.pacer.gov

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

8. Exception to discharge deadline

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

You must start a judicial proceeding by filing a complaint if you want to have a debt excepted from discharge under 11 U.S.C. § 1141(d)(6)(A).

Deadline for filing the complaint: Not yet set.

9. Creditors with a foreign address

If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

10. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtors will remain in possession of the property and may continue to operate its business.

11. Discharge of debtors

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtors except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge under 11 U.S.C. § 1141(d)(6)(A), you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, N.J. 08648
(609) 275-0400

Leah Kagan, Esq.
SIMON GREENSTONE PANATIER, PC
1201 Elm Street. Suite 3400
Dallas, TX 75270
(214) 276-7680

By: Robert E. Lytle (ID #046331990)
Attorneys for Plaintiffs

April Dejesus and Edwin DeJesus,

Plaintiffs,

v.

Brentag North America, Inc. , INC., et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.:MID-L-6247-18AS

Civil Action – Asbestos Litigation

**ORDER SEVERING
IMERYS TALC AMERICA, INC.**

This matter having been opened to the Court on behalf of Plaintiffs, April Dejesus and Edwin DeJesus, by Szaferman, Lakind, Blumstein & Blader, P.C. (Robert E. Lytle, Esq., appearing), on notice to all counsel of record; and this Court having considered the papers and arguments of counsel for and against this motion, and for good cause shown,

IT IS ON THIS ____ day of April 2019;

ORDERED that all claims, counterclaims, cross-claims and/or Third Party claims against Defendant Imerys Talc America, Inc. shall be severed from this matter; and

IT IS FURTHER ORDERED that if and when the Automatic Stay of the Bankruptcy

Court of Delaware in the matter of Imerys Tals America, Inc., Case No. 19-10289-LSS is lifted, the matter of April Dejesus and Edwin DeJesus v. Imerys Talc America, Inc. shall proceed to trial; and

IT IS FURTHER ORDERED that a copy of this Order shall be served on all parties within seven (7) days.

HONORABLE ANA C. VISCOMI, J.S.C.

_____ Opposed

_____ Unopposed

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, N.J. 08648
(609) 275-0400

Leah Kagan, Esq.
SIMON GREENSTONE PANATIER, PC
1201 Elm Street, Suite 3400
Dallas, TX 75270
(214) 276-7680

By: Robert E. Lytle (ID #046331990)

Attorneys for Plaintiffs

April DeJesus and Edwin DeJesus,

Plaintiffs,

v.

Brentag North America, Inc. , et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L-6247-18AS

Civil Action – Asbestos Litigation

CERTIFICATE OF SERVICE

I, Gwyneth Haynes-Rodman, being of full age, do certify and say:

1. I am a paralegal employed in the office of Szaferman, Lakind, Blumstein & Blader, P.C., Lawrenceville, New Jersey.
2. On April 11, 2019, at the direction of Robert E. Lytle, Esq., I arranged for hand delivery of an original and two copies of the following documents for filing to the Clerk, Multi County - Asbestos, Middlesex County Superior Court, 56 Paterson Street, Tower Wing, 2nd Floor, New Brunswick, New Jersey 08903:

- a. Plaintiffs' Notice of Motion to Sever All Claims Against Defendant Imerys Talc America, Inc., pursuant to R. 4:38-2(a);

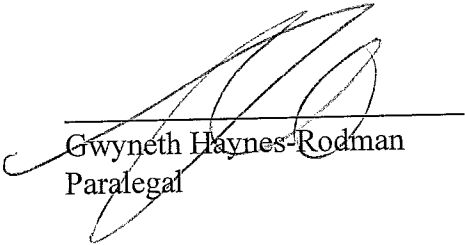
- b. Brief in support of Plaintiffs' Motion to Sever All Claims Against Defendant Imerys Talc America, Inc., in this case;
- c. Supporting Certification of Robert E. Lytle, with exhibits;
- d. Proposed Form of Order; and
- e. Certificate of Service.

3. Also, on April 17, 2019, I arranged for delivery via email and Federal Express of one copy of the documents listed in number 2 above to counsel for Imerys Talc America, Inc., John C. McMeekin II, Esq., Rawle & Henderson, LLP, Widener Building, One South Penn Square, 1339 Chestnut Street, 16th Floor, Philadelphia, PA 19107.

4. Also, on April 17, 2019, I arranged for delivery via email and Regular United States Postal Service of one copy of the documents listed in number 2 above to all counsel on the attached list.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment. R. 1:4-4.

Dated: April 17, 2019


Gwyneth Haynes-Rodman
Paralegal

APRIL DEJESUS and EDWIN DEJESUS v. BRENNTAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.), et al

DOCKET NO. MID-L- 6247 -18AS

COUNSEL MAILING LIST

LAST UPDATED: 3.1.19

ATTORNEY: REL

Our File: 84237.1

Robert E. Lytle, Esq.
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Ph: 214-276-7680
Fx: 214-276-7699

Co-Counsel for Plaintiffs

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Albert L. Piccerilli, Esquire
Montgomery McCracken Walker & Rhoads LLP
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Cherry Hill, NJ 08002-2220
Ph: 856-488-7700
Fx: 215-731-3636
apiccerilli@mmwr.com
rhurst@mmwr.com
mmwr_asbestos@mmwr.com
Counsel for Brenntag North America, Inc.;
Brenntag Specialties, Inc.

Donna duBeth Gardiner
McElroy Deutsch Mulvaney & Carpenter, LLP
1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, NJ 07962-2075
Ph: 973-993-8100
Fx: 973-425-0161
dgardiner@mdmc-law.com
Asbestos-NJ@mdmc-law.com
Counsel for Coty, Inc.

John C. McMeekin II, Esq.
Linda Dobbins, Esq.
Rawle & Henderson LLP
Widener Building
One South Penn Square
1339 Chestnut Street, 16th Floor
Philadelphia, PA 19107
Ph: 215-575-4200
Fx: 215-563-2583
ldobbins@rawle.com
jmcmeekin@rawle.com
NJAsbestos@rawle.com
Counsel for Cyprus Amax Minerals
Company; and Imerys Talc America, Inc.

John C. Garde, Esq.
McCarter & English
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07102
Ph: 973-622-4444
Fax: 973-624-7070
jgarde@mccarter.com
njasbestos@mccarter.com
NJTALC@mccarter.com
Counsel for Johnson & Johnson;
Johnson & Johnson Consumer, Inc.

Vincent Lodato, Esq.
Beth Rose, Esq.
Sills Cummis & Gross
The Legal Center
One Riverfront Plaza
Newark, NJ 07102
Ph: 973-643-7000
Fx: 973-643-6500
brose@sillscummis.com
vlodato@sillscummis.com
Counsel for Rue21, LLC; New Rue21; and
Enchante Accessories, Inc.

H. Lockwood Miller, Esq.
Goldberg Segalla, LLP
1037 Raymond Blvd., Suite 1010
Newark, NJ 07102
Ph: 973-681-7012
Fx: 973-681-7101
njasbestosgroup@goldbergsegalla.com
hmliller@goldbergsegalla.com
etorres@goldbergsegalla.com
**Counsel for The Procter & Gamble Co., and
Noxell Corporation**

Pooja R. Patel, Esq.
Charles M. McGivney, Esq.
Joel Clark, Esq.
McGivney, Kluger & Cook, P.C.
18 Columbia Turnpike, 3rd Floor
Florham Park, New Jersey 07932
Ph: 973-822-1110
Fx: 973-822-1116
MKNJAsbestos@mklaw.us.com
jclark@mklaw.us.com
cmcgivney@mklaw.us.com
ppatel@mklaw.us.com
Counsel for Whittaker Clark & Daniels, Inc.